

JENNIFER BERGH

Nevada Bar No. 14480

QUILLING SELANDER LOWNDS

WINSLETT & MOSER, P.C.

2001 Bryan Street, Suite 1800

Dallas, Texas 75201

Telephone: (214) 560-5460

Facsimile: (214) 871-2111

jbergh@qslwm.com

COUNSEL FOR TRANS UNION LLC

****Designated Attorney for Personal Service****

Kurt Bonds, Esq.

Nevada Bar No.: 6228

6605 Grand Montecito Parkway, Suite 200

Las Vegas, Nevada 89149

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

BRENDA KARATAS,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC., PORTFOLIO RECOVERY
ASSOCIATES, LLC, CALVARY PORTFOLIO
SERVICES LLC, TRANS UNION LLC,
CITIZENS COMMUNITY FEDERAL, N.A.,
INNOVIS DATA SOLUTIONS, INC., AND
AQUA FINANCE, INC.,

Defendants.

Case No. 2:21-cv-01956-JAD-BNW

**JOINT MOTION AND ORDER
EXTENDING DEFENDANT TRANS
UNION LLC'S TIME TO FILE AN
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S COMPLAINT
(FIRST REQUEST)**

Plaintiff Brenda Karatas ("Plaintiff") and Defendant Trans Union LLC ("Trans Union"), by and through their respective counsel, file this Joint Motion Extending Defendant Trans Union's Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.

1. On October 25, 2021, Plaintiff filed her Complaint. Trans Union was served with Plaintiff's Complaint on November 1, 2021. The current deadline for Trans Union to answer or otherwise respond to Plaintiff's Complaint is November 22, 2021.

2. On November 15, 2021, counsel for Trans Union communicated with Plaintiff's counsel via email regarding an extension within which to file a response to the Complaint, and Plaintiff's counsel agreed to the extension.

3. The parties will actively discuss a potential early resolution of this case, and the parties believe an extension of this nature may save waste of the parties' time and expense. The additional time will allow Plaintiff and Trans Union time to fully explore such early settlement discussions.

4. Moreover, Trans Union's counsel will need additional time to review the documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made in good faith and not for the purposes of delay.

5. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or otherwise respond to Plaintiff's Complaint up to and including December 22, 2021. This is the first motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

Dated this 22nd day of November 2021.

QUILLING SELANDER LOWNDS
WINSLETT & MOSER, P.C.

/s/ Jennifer Bergh

Jennifer Bergh
jbergh@qslwm.com
Nevada Bar No. 14480
2001 Bryan Street, Suite 1800
Dallas, Texas 75201
(214) 560-5460
(214) 871-2111 Fax
COUNSEL FOR TRANS UNION LLC

Order

IT IS SO ORDERED

DATED: 1:24 pm, November 23, 2021



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

FREEDOM LAW FIRM AND KIND LAW

/s/ Gerardo Avalos

George Haines
ghaines@freedomlegalteam.com
Gerardo Avalos
gavalos@freedomlegalteam.com
8985 S. Eastern Avenue, Suite 350
Las Vegas, NV 89123

(702) 880-5554
(702) 385-5518 Fax
and
Michael Kind
mk@kindlaw.com
Kind Law
8860 S. Maryland Parkway, Suite 106
Las Vegas, NV 89123
(702) 337-2322
(702) 329-5881 Fax
COUNSEL FOR PLAINTIFF